

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:) **17-06168**
)
Patricia Loresch, and) **Chapter 13**
Michael A. Loresch, Sr.,)
Debtors.) **Hon. Judge David D. Cleary**

NOTICE OF MOTION

TO: See attached list

On February 1, 2021, at 9:00 a.m., I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and Passcode: The meeting ID for this hearing is 161 122 6457 and the passcode is Cleary644. The meeting ID and passcode can also be found on Judge Cleary's webpage on the court's website, <https://www.ilnb.uscourts.gov/content/judge-david-d-cleary>.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Movants: Patricia & Michael Loresch, Sr.
By: Michael R. Colter, II
David M. Siegel & Assoc., LLC
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100
mcolter@davidmsiegel.com

CERTIFICATE OF SERVICE

I certify that I served a copy of this notice and the attached motion on each entity shown on the list below at the address shown and by the method indicated on the list on January 22, 2021, at 5:00 p.m.

/s/ Michael R. Colter, II
Michael R. Colter, II

To the following persons or entities who have been served via electronic mail:

U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov
Marilyn O. Marshall, Chapter 13 Trustee: clecall@chi13.com

To the following persons or entities who have been served via U.S. Mail:

Mr. and Mrs. Loresch
105 N. LaVergne
Northlake, IL 60164

Nicor Gas
PO Box 549
Aurora, IL 60507

American Advisors Group
3900 Capital City Blvd.
Lansing, MI 48906

Illinois Dept. of Revenue
Attn: Bankruptcy Division
P.O. Box 19035
Springfield, IL 62794

Loyola University Medical Center
c/o Thomas F. Courtney & Associates
7000 W. 127th Street
Palos Heights, IL 60463

Commonwealth Edison Company
Attn: Bankruptcy Department
1919 Swift Drive
Oakbrook Terrace, IL 60523

The Illinois Tollway
PO Box 5544
Chicago, IL 60680

Verizon
by American InfoSource LP as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118

CFAM Financial Services LLC
PO Box 601329
Dallas, TX 75360-1329

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DEBTORS' MOTION TO VACATE PAYROLL ORDER

NOW COME the Debtors, Patricia and Michael Loresch, Sr., by and through their attorney, David M. Siegel & Associates, LLC, to present this Motion, and in support thereof states as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the U.S. District Court for the Northern District of Illinois.
2. On March 1, 2017, the Debtors filed a voluntary petition for relief under Chapter 13 of Title 11 USC, and the plan was confirmed on May 22, 2017. Marilyn O. Marshall was appointed Trustee in this case.
3. On March 3, 2017, an Order to Employer to Pay the Trustee was entered for Michael Loresch, Sr., at document #11, requesting that his employer deduct the full amount of the proposed monthly plan payment each month and forward the payment to the Trustee.
4. The Debtors are now done with their payments to the trustee per the trustee's own information on the National Data Center website (Exhibit A).
5. The Debtors seek to have the payroll control order at document #11 vacated.

WHEREFORE, the Debtors, Patricia and Michael Loresch, Sr., pray that this Honorable Court enter an Order to vacate the prior payroll control order, and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II
Michael R. Colter, II, A.R.D.C. #6304675
Attorney for the Debtor(s)

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Attorney for Debtor(s)
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Wheeling, IL 60090
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